

GERALD J. McMAHON
ATTORNEY AT LAW
THE STANDARD OIL BUILDING
26 BROADWAY, 18TH FLOOR
NEW YORK, NEW YORK 10004

(212) 797-1877 (TEL)

(212) 797-1419 (FAX)

gm@geraldjcmahon.com (E-MAIL)

LEGAL ASSISTANT

Cassandra Lapal Williams

WEBSITE
www.geraldjcmahon.com

April 16, 2015

By ECF

The Honorable Marilyn D. Go
United States Magistrate Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Choudry Khalil
13 Cr. 386 (S-3) (RRM)

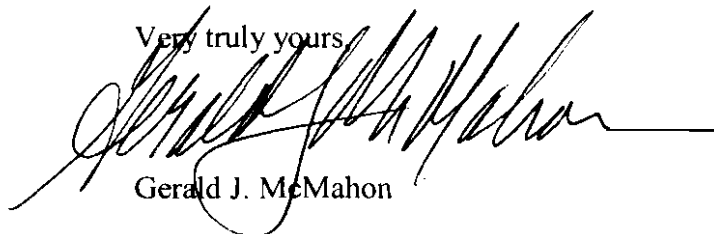
Dear Judge Go:

In connection with the selection of the jury in the above-referenced case, and in response to the government letter filed yesterday (docket no. 71), please add the following names to the list of witnesses/names read to potential jurors:

Mahnoor Khalil
Ravinder Nath Sharma

Additionally, we object to the phrase in the government's proposed description of the case: "The defendant ... is charged with being part of an organization that smuggled undocumented aliens ...". The indictment charges defendant with "conspiring with others", not being "part of an organization."

Very truly yours



Gerald J. McMahon

GJM;cw
cc: All Counsel (By ECF)